

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

DAWNESE SAHOTA, individually,
and as Personal Representative of
the ESTATE OF DONALD
SAHOTA;

PLAINTIFF,
vs.

COUNTY OF CLARK; DEPUTY
JONATHAN FELLER, individually
and as an employee of County of
Clark;

DEFENDANTS.

No. 3:25-cv-5054

COMPLAINT AND JURY DEMAND

I. INTRODUCTION

1.1 This is a civil rights and wrongful death action arising from negligence and excessive force by Clark County Sheriff's Office (CCSO) Deputy Jonathan Feller when he shot and killed off-duty police officer Donald Sahota on January 29, 2022.

1.2 Plaintiff alleges negligence and civil rights violations based on negligence, excessive force, CCSO's failure to properly train Deputy Feller, and Clark County's ratification of the shooting and killing.

1 1.3 Defendant Feller, acting in his official capacity as a law enforcement officer
 2 for Clark County, Washington, deprived plaintiff of her rights, property, liberty,
 3 and Officer Sahota's life without due process of law, in violation of the Fourteenth
 4 Amendment to the United States Constitution, 42 U.S.C. § 1983, federal statutes
 5 and applicable Washington State laws.

6 1.4 More specifically, Defendant Feller acted rashly and negligently when he
 7 shot off-duty police officer Donald Sahota in the back. Officer Sahota was running
 8 toward his own home in pursuit of a suspect. Defendant Feller arrived at the scene
 9 and fired his weapon within approximately four seconds of exiting his vehicle. He
 10 failed to identify Officer Sahota, failed to identify the suspect, failed to assess the
 11 situation, failed to properly prepare his equipment, failed to follow directives,
 12 failed to identify himself as a law enforcement officer, failed to give a proper
 13 warning before shooting, and failed to properly apply accepted standards for use
 14 of deadly force.

15 1.5 Further, about fifteen months prior to this shooting, Defendant Feller was
 16 similarly negligent in firing his weapon before he properly assessed a situation.
 17 In both situations, he raced to the action even though he had no assigned role.

18 1.6 Defendant Feller's actions give definition to the phrase "trigger happy."

19 II. PARTIES

20 2.1 Defendant COUNTY OF CLARK, a municipal corporation, is a lawfully
 21 constituted municipal corporation and body politic of the State of Washington, and
 22 at all times material to this action operated CCSO.

1 2.2 Defendant JONATHAN FELLER, is, and at all times relevant was, a
2 resident of Washington and employee of CCSO, acting as a lawfully commissioned
3 law enforcement officer under the color of state law. Deputy Feller is being sued
4 in his individual capacity, personal capacity, and official capacity.

5 2.3 Plaintiff DAWNESE SAHOTA was the decedent's wife and is the properly
6 appointed Personal Representative of the ESTATE OF DONALD SAHOTA.
7 Dawnese Sahota is a citizen of the United States residing in Battle Ground,
8 Washington.

9 2.4 Plaintiff brings claims individually and as the Personal Representative of
10 the ESTATE OF DONALD SAHOTA. Plaintiff brings all claims available to her
11 individually and to the ESTATE OF DONALD SAHOTA and all beneficiaries
12 under all federal and state laws.

13 2.5 DONALD SAHOTA was 52 years old when he was killed by Defendant
14 Feller. He was a resident of Battle Ground, Washington.

III. JURISDICTION AND VENUE

16 3.1 This action is brought pursuant to 42 U.S.C. § 1983, Fourth, and Fourteenth
17 Amendment.

18 3.2 Jurisdiction is founded on 28 U.S.C. § 1331 and the aforementioned
19 statutory and constitutional provisions.

20 3.3 This action also includes state law claims arising from the same incident
21 and involving the same parties.

1 3.4 This court can and should exercise supplemental jurisdiction over state
 2 claims and other parties under 28 U.S.C. § 1337(a), as the other claims “are so
 3 related to claims in the action within such original jurisdiction that they form part
 4 of the same case or controversy under Article III of the United States
 5 Constitution.”

6 3.5 All Defendants were resident in or doing business in County of Clark,
 7 Washington, and the Western District of the United States Federal Court for
 8 Washington, and are citizens of the United States of America.

9 3.6 Venue is proper in this District pursuant to 28 U.S.C. § 1331 as a
 10 substantial part of the events and omissions giving rise to the claims asserted
 11 herein occurred in County of Clark, Washington, which is in this court’s district
 12 and division.

13 3.7 The complaint is timely filed within the applicable statute of limitations.
 14 RCW 4.16.080. The United States Supreme Court and the Ninth Circuit Court of
 15 Appeals have held that 42 U.S.C. § 1983, which does not contain a statute of
 16 limitations, adopts the relevant statute of limitations for personal injury actions.
 17 *Wilson v. Garcia*, 471 U.S. 261 (1985); *Stanley v. Trustees of California State*
 18 *University*, 433 F.3d 1129 (9th Cir. 2006).

19 3.8 Plaintiff properly filed a timely RCW 4.96.020 Tort Claim with Clark
 20 County on November 22, 2024. Over sixty days have elapsed since the claim was
 21 filed and all substantive and procedural requirements of R.C.W. 4.96.020 have
 22 been met.

IV. FACTS

2 4.1 On January 29, 2022, Donald Sahota was 52 years old. He was married to
3 Dawnese Sahota. Together, they had two children. The family resided in Battle
4 Ground, Washington.

5 4.2 Donald Sahota had been a police officer with the Vancouver Police
6 Department since 2014.

7 4.3 Prior to serving with the Vancouver Police Department, he served with the
8 Gresham Police Department.

9 4.4 As of January 2022, Donald Sahota had a combined 20 years of service in
10 law enforcement.

11 4.5 He enjoyed time with his family, and outdoor activities, including hiking
12 and fishing.

13 4.6 He was known by family and friends as a skilled handyman, often working
14 on projects around the home.

15 4.7 He was active in the community, known for assisting neighbors and
16 participating in local events.

17 4.8 Officer Sabota was a devoted family man and committed public servant.

18 4.9 On the evening of January 29, 2022, a robbery occurred at a Chevron gas
19 station in the Orchards area of Clark County, Washington.

20 4.10 The suspect, later identified as Julio Cesar Segura, fled the scene heading
21 northbound on Interstate 205.

1 4.11 A description of Segura was relayed via dispatch to all Clark County
2 Sheriff's Office (CCSO) deputies on patrol, including Defendant Feller.

3 4.12 Deputies disabled Segura's vehicle near Battle Ground, Washington.

4 4.13 Segura abandoned the vehicle and fled on foot into a rural neighborhood.

5 4.14 Segura approached the residence of off-duty Vancouver Police Officer
6 Donald Sahota, located at the end of a private road.

7 4.15 Officer Sahota's wife, Dawnese, called 911 and reported a suspicious
8 individual outside their house.

9 4.16 Officer Sahota, off duty, exited his house to check on what the suspicious
10 individual – Segura – was doing there.

11 4.17 Sahota struggled with Segura in Sahota's driveway. The two of them can be
12 seen on aerial video in what appears to be a physical fight.

13 4.18 Segura broke away from Sahota and ran toward the front door of Sahota's
14 home. Officer Sahota pursued Segura toward the front door.

15 4.19 Defendant Feller arrived in his CCSO SUV as Officer Sahota was pursuing
16 Segura toward the front door of Sahota's home.

17 4.20 Officer Sahota did not match the physical description of Segura that had
18 been relayed via dispatch.

19 4.21 Officer Sahota was not wearing the same clothes as Segura.

20 4.22 Before Defendant Feller shot Officer Sahota, Defendant Feller neither
21 asked dispatch for, nor received, any description of the off-duty officer and
22 homeowner.

1 4.23 Within approximately four seconds of stopping his SUV, and without
2 identifying himself as a law enforcement officer, and without issuing a warning,
3 Defendant Feller fired at least four rounds from his Smith & Wesson model M&P-
4 15 .223 Remington caliber semi-automatic rifle.

5 4.24 Defendant Feller fired his rifle toward Sahota's back as Sahota was running
6 away from Defendant Feller and toward his own home.

7 4.25 At the time Defendant Feller shot and killed Officer Sahota, Feller provided
8 no opportunity for Officer Sahota to identify himself.

9 4.26 At least three of the bullets fired by Defendant Feller struck Officer Sahota.

10 4.27 Officer Sahota sustained multiple gunshot injuries, including two to his
11 right back.

12 4.28 At the time Defendant Feller fired his rifle, he had failed to identify Officer
13 Sahota, failed to identify the suspect, failed to assess the situation, failed to
14 properly prepare his equipment, failed to follow directives, failed to identify
15 himself as a law enforcement officer, failed to give a proper warning before
16 shooting, and failed to properly apply accepted standards for use of deadly force.

17 4.29 Defendant Feller's rifle was equipped with a holographic sighting optic
18 designed for improved aim. Defendant Feller, however, had the optic improperly
19 set for daytime mode while patrolling at night.

20 4.30 In part due to his failure to properly set his optic on night setting, the overly
21 bright red holographic reticle, intended for daylight conditions, obscured

1 Defendant Feller's vision of the target in the low-light environment of night. This
2 impaired his ability to properly see and assess the situation.

3 4.31 At the time Defendant Feller shot his rifle at Officer Sahota's back, Officer
4 Sahota had committed no crime.

5 4.32 At the time Defendant Feller shot Officer Sahota, Sahota was not under
6 arrest.

7 4.33 At the time Defendant Feller shot Officer Sahota, the force Feller wrongly
8 applied was deadly and intended to be deadly.

9 4.34 At the time Defendant Feller shot and killed Officer Sahota, Feller made no
10 effort to temper or limit the amount of force used.

11 4.35 At the time Defendant Feller shot and killed Officer Sahota, there were no
12 innocent lives at risk from Sahota.

13 4.36 Prior to shooting at Officer Sahota, a reasonable officer would have issued
14 warnings.

15 4.37 Prior to shooting at Officer Sahota, a reasonable officer would have
16 confirmed the identity of the person he was targeting.

17 4.38 Under these facts, no reasonable officer would stop his SUV and within four
18 seconds fire his rifle at the back of an unknown person who presented no
19 immediate or identifiable threat.

20 4.39 Defendant Feller relied on guesswork when deciding to shoot someone in
21 the back with his rifle.

1 4.40 As a result of the force used by Defendant Feller, Sahota fell immediately
2 to the ground and, after a period of suffering and agony, died from his injuries.

3 4.41 The Lower Columbia Major Crimes Team conducted an investigation into
4 the incident.

5 4.42 On February 6, 2022, Defendant Jonathan Feller was interviewed
6 regarding the shooting incident by Detective Craig Christianson and Sergeant
7 Kevin Tate. Defendant Feller's attorney, Mike Staropoli, was present during the
8 interview.

9 4.43 Defendant Feller stated that his assigned geographic area for calls was in
10 Hazel Dell, some distance from the incident location. He admitted leaving his
11 designated beat to insert himself into the action.

12 4.44 Defendant Feller admitted his initial role at the scene was self-directed.

13 4.45 Defendant Feller admitted that before arriving at the scene, he was
14 "psyching" himself up.

15 4.46 Defendant Feller admitted that during the incident, updates were coming
16 over the radio, including confirmation that the SWAT leader, Tyler Trenton, had
17 been contacted and SWAT was being paged.

18 4.47 Defendant Feller admitted hearing Sergeant Bieber over the radio when
19 the Sergeant said, "Our job is to contain this. SWAT's gonna come in with the dog,
20 and that's what we're gonna do." Despite this directive, Feller deviated from the
21 instruction to focus solely on containment.

1 4.48 Defendant Feller admitted that dispatch announced they received a phone
2 call from the house, identifying it as the home of an off-duty law enforcement
3 officer and confirming they were in communication with the occupants.

4 4.49 Defendant Feller admitted "Dispatch said that the law enforcement officer
5 - the off-duty law enforcement officer had armed himself. Um, and that, uh, he's
6 tryin' to take him into custody."

7 4.50 Defendant Feller admitted being aware that additional resources, including
8 tactical units from SWAT, were on their way to assist.

9 4.51 Defendant Feller admitted he did not wait for the better-trained and better-
10 equipped units to arrive.

11 4.52 Defendant Feller admitted that, based on the last update he received before
12 shooting, he knew the off-duty law enforcement officer was the one who had armed
13 himself and was actively trying to take the suspect into custody.

14 4.53 Defendant Feller admitted he could not see the front of the house or any
15 activity occurring there until just before he arrived in his CCSO SUV.

16 4.54 Defendant Feller admitted that his siren was initially activated but was
17 turned off as he neared Sahota's house.

18 4.55 Defendant Feller admitted that he was never in fear for his own life during
19 the incident.

20 4.56 Defendant Feller admitted he had no idea how many people were inside the
21 house.

22 4.57 Defendant Feller admitted he did not hear any gunfire prior to shooting.

1 4.58 Defendant Feller admitted he gave no verbal warning that he would shoot
2 or any instruction for Officer Sahota to drop the gun.

3 4.59 Defendant Feller admitted he did not identify himself as law enforcement
4 before shooting.

5 4.60 Defendant Feller admitted that as he saw Sahota run toward the front door,
6 he fired his rifle multiple times while looking through his optic and aiming center
7 mass.

8 4.61 Defendant Feller admitted that immediately after shooting at Sahota, he
9 saw Sahota “step away from the door, and back up to the wall, and slide down.”

10 4.62 Defendant Feller admitted that just moments after shooting Sahota, “two
11 hands came out of the front door. Then, eventually, a whole body. It was another
12 male. And somebody - I don’t know who - yelled, ‘That’s the suspect.’ That -
13 something to that effect. ‘That’s the suspect.’ And then I realized that I hadn’t shot
14 the suspect. I had shot the homeowner, who was a off-duty law enforcement
15 officer.” He said, “I don’t remember much after that.”

16 4.63 Shortly after shooting Sahota, Feller was heard by Deputy Nic Siem yelling
17 “Fuck, fuck, fuck, fuck.”

18 4.64 The Clark County Medical Examiner’s Office determined that Sahota died
19 from gunshot wounds inflicted by Defendant Feller.

20 4.65 On information and belief, the Clark County Medical Examiner’s Office
21 determined that the gunshot wounds sustained by Sahota hit him in the back and
22 traveled from back to front.

1 4.66 The autopsy confirmed that the manner of Sahota's death was homicide.

2 4.67 The actions of Defendant Feller, as described above, were excessive,
3 unreasonable, negligent, dangerous violations of generally accepted police
4 standards.

5 4.68 The actions of Defendant Feller imposed substantial harm on Officer
6 Sahota before, during, and after Defendant Feller shot him.

7 4.69 At all times during the above-described incident, Defendant Feller was
8 acting in the scope of his employment with Clark County and under color of law.

9 4.70 County of Clark is liable for these actions by Defendant Feller, which
10 resulted in the death of Officer Sahota.

11 4.71 Sheriff Chuck Atkins, as the Sheriff of Clark County at the time of the
12 shooting, held the authority to ratify, sanction, or correct the actions of Defendant
13 Feller in his negligent tactics and use of force against Officer Sahota.

14 4.72 Following the incident, the Clark County Sheriff's Office conducted an
15 administrative review of the killing of Officer Sahota.

16 4.73 On information and belief, Sheriff Atkins reviewed the final internal
17 administrative report and took no action to discipline or retrain Defendant Feller.

18 4.74 Sheriff Atkins had final policymaking authority for the Clark County
19 Sheriff's Office concerning the actions of Defendant Feller.

20 4.75 Sheriff Atkins was made aware that Defendant Feller created the danger
21 to Officer Sahota through his negligence, which directly caused Sahota's death.

1 4.76 Sheriff Atkins made a deliberate choice to approve the acts of Defendant
2 Feller and the rationale behind those acts.

3 4.77 Sheriff Atkins ratified the actions of Defendant Feller.

4 4.78 Clark County's failure to take corrective action demonstrates a deliberate
5 indifference to the risk of constitutional violations and harm resulting from its
6 policies and practices.

7 4.79 In fact, the shooting of Officer Sahota by Defendant Feller was not the first
8 time Feller hastily and negligently shot at an individual who was running away.

9 4.80 Prior to the incident where Defendant Feller shot Officer Sahota, Feller
10 shot and killed another individual without properly assessing the situation.

11 4.81 In that prior incident, the individual was running away from other police
12 officers. Feller had very little information about the situation.

13 4.82 Feller drove onto the scene, quickly exited his vehicle, and almost
14 immediately began firing, similar to his actions in the present case.

15 4.83 The Clark County Sheriff's Office reviewed the previous shooting, ratified
16 Feller's use of excessive force, and failed to discipline or retrain him.

17 4.84 Clark County's lack of corrective action allowed Defendant Feller to again
18 make a hasty and unjustified decision to use lethal force.

19 4.85 Officer Sahota would likely be alive but for Clark County's failure to
20 discipline or retrain Defendant Feller after the previous shooting.

21 4.86 Defendant Feller's previous shooting was also ratified by Sheriff Atkins.

1 4.87 As a direct and foreseeable result of Defendants' actions, Officer Sahota lost
2 his life. Plaintiff, Officer Sahota, his family, and his estate have suffered
3 compensable damages, with the full extent to be determined at trial.

4 4.88 On November 22, 2204, a notice of Tort Claim, as required under RCW 4.96
5 et. seq., was mailed, emailed, and faxed to Clark County.

6 4.89 The notice of claim was received by the County of Clark on November 22,
7 2204.

8 4.90 Sixty or more days have elapsed between the filing of the claim and the
9 filing of this complaint.

10 | 4.91 All legal requirements for the filing of this claim have been met.

**V. FIRST CAUSE OF ACTION
NEGLIGENCE
(State Law)**

14 | 5.1 Plaintiff hereby restates and incorporates by reference all paragraphs of
15 | this Complaint as if fully set forth herein.

16 5.2 On the date that Defendant Feller shot and killed Officer Sahota, he was
17 acting as an agent of the County of Clark and within the scope of his employment
18 with the County of Clark.

19 5.3 County of Clark and its agents, including Defendant Feller, owe a duty of
20 reasonable care to persons with whom he interacts.

21 5.4 Defendant Feller has a duty of reasonable care to refrain from inflicting or
22 causing unnecessary harm on others under general notions of negligence and the
23 common law.

1 | 5.5 The County of Clark and Defendant Feller owed such a duty to Officer
2 | Sahota.

3 | 5.6 Defendant Feller breached that duty.

4 | 5.7 Defendants' breach of duty proximately caused Officer Sahota's injuries and
5 | death, as described above.

6 5.8 County of Clark is responsible for the acts of its agent and employees,
7 including Defendant Feller.

8 5.9 The County of Clark, along with Defendant Feller, is therefore liable for
9 Officer Sahota's injuries and death.

10 5.10 As a result of the acts of Defendants, Officer Sahota suffered injury to body
11 and mind, significant pain, emotional distress, disfigurement, disability, and
12 death.

13 5.11 Plaintiff is therefore entitled to recover damages in the amount to be proven
14 at trial.

**VI. SECOND CAUSE OF ACTION
EXCESSIVE FORCE**
(4th Amendment and 42 U.S.C. § 1983)

18 6.1 Plaintiff hereby restates and incorporates by reference all paragraphs of
19 this Complaint as if fully set forth herein.

20 | 6.2 Defendant Feller used excessive force when he killed Officer Sahota.

21 6.3 As described in the preceding paragraphs, the conduct of Defendant Feller
22 toward Officer Sahota constituted excessive force in violation of the Fourth
23 Amendment of the United States Constitution.

1 6.4 The misconduct described in this Count was objectively unreasonable and
2 undertaken with willfulness and reckless indifference to the rights of Officer
3 Sahota.

4 6.5 The right to be free from excessive force by state actors was well known to
5 Defendant Feller and was clearly established at the time of these acts and events.
6 Qualified immunity defenses are not available to the Defendant here.

7 6.6 As a proximate result of Defendant Feller's violation of the Officer Sahota's
8 constitutional rights, Plaintiff suffered and will continue to suffer damages in the
9 amount to be proven at trial.

10 6.7 The conduct of Defendant Feller also subjects him to punitive damages in
11 an amount to be proven at trial.

**VII. THIRD CAUSE OF ACTION
DEPRIVATION OF FAMILIAL RELATIONSHIPS
SUBSTANTIVE DUE PROCESS**

(Due Process 14th Amendment and 42 U.S.C. § 1983 *et seq.*)

16 7.1 Plaintiff hereby restates and incorporates by reference all paragraphs of
17 this Complaint as if fully set forth herein.

18 7.2 Defendant Feller acted under color of state law. Defendant exercised his
19 authority as a Clark County Sheriff's Office deputy, responding to a call and
20 controlling the actions and decisions at the scene. This authority, derived from his
21 official position, enabled him to take the acts that resulted in the death of Officer
22 Sahota.

1 7.3 Plaintiff has a constitutionally protected interest to be free from the
2 deprivation of a familial relationship without due process.

3 7.4 As a proximate result of Defendants' actions, Plaintiff has suffered and will
4 continue to suffer damages, including emotional distress and loss of
5 companionship, in an amount to be determined at trial.

6 7.5 The conduct of Defendant Feller also subjects him to punitive damages in
7 an amount to be proven at trial.

**VIII. FOURTH CAUSE OF ACTION
MONELL CLAIM - RATIFICATION
(42 U.S.C. § 1983 *et seq.*)**

11 8.1 Plaintiff hereby restates and incorporates by reference all paragraphs of
12 this Complaint as if fully set forth herein.

8.2 Defendant Feller acted under color of state law.

14 8.3 The actions of Defendant Feller deprived Officer Sahota of his particular
15 rights under the laws of the United States, and the United States Constitution.

8.4 CCSO Sheriff Atkins acted under color of state law.

17 8.5 Sheriff Atkins had final policymaking authority from defendant Clark
18 County Sheriff's Office concerning the acts of Defendant Feller.

19 8.6 Sheriff Atkins ratified Defendant Feller's acts. Atkins knew of and
20 specifically made a deliberate choice to approve Defendant Feller's acts and the
21 basis for them.

1 8.7 As a result of Sheriff Atkin's ratification, the County of Clark is liable for
2 the violation of Officer Sahota's constitutional rights, which caused Plaintiffs to
3 suffer damages that will be made more certain at trial.

**IX. FIFTH CAUSE OF ACTION
MONELL CLAIM - FAILURE TO TRAIN
(42 U.S.C. § 1983 *et seq.*)**

8 9.1 Plaintiff hereby restates and incorporates by reference all paragraphs of
9 this Complaint as if fully set forth herein.

10 | 9.1 Defendant Feller acted under color of state law.

11 9.2 The actions of Defendant Feller, deprived Officer Sahota of rights under the
12 laws of the United States, and the United States Constitution.

13 9.3 The training, practices, or policies of the Clark County Sheriff's Office were
14 not adequate to prevent violations of law by its employees.

15 9.4 The defendant Clark County was deliberately indifferent to the substantial
16 risk that its policies were inadequate to prevent violations of law by its employees,
17 including known or foreseeable consequences of its failure to adequately train its
18 deputies.

19 9.5 The failure of the defendant Clark County to prevent violations of law by
20 its employees, or to provide adequate training, caused the deprivation of the
21 plaintiff's rights. Defendant's failure to prevent violations of law by its employees,
22 or to train, played a substantial part in bringing about or actually causing the
23 injury or damage to the plaintiff.

1 9.6 The County of Clark has therefore violated Officer Sahota's constitutional
 2 rights causing Plaintiff to suffer damages in an amount to be proven at trial.

3 **X. DAMAGES AND PRAYER FOR RELIEF**

4 10.1 For judgment against each of the Defendants, jointly and severally, for
 5 monetary special damages in an amount to be determined at trial;

6 10.2 For judgment against each of the Defendants, jointly and severally, for
 7 damages in the form of non-economic loss, personal injuries, emotional distress,
 8 embarrassment, loss of reputation, loss of enjoyment of life, in an amount
 9 presently unknown and to be made more certain at the time of trial, as well as
 10 incurring attorney fees and other losses;

11 10.3 For judgment against each of the Defendants, jointly and severally, for
 12 general compensatory damages in an amount to be determined at trial;

13 10.4 For judgment against Defendant Feller for punitive damages in an amount
 14 to be determined at trial;

15 10.5 For attorney fees and costs authorized by statute, including reasonable
 16 attorney's fees pursuant to 42 U.S.C. §1988 and RCW 4.84.010;

17 10.6 And Plaintiff prays for damages as previously noted, together with other
 18 equitable relief, costs of this action, attorneys' fees, prejudgment interest on any
 19 lost wages or liquidated sums, punitive damages and any other relief as the Court
 20 deems equitable and just.

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1 **XI. JURY DEMAND**

2 11.1 Plaintiff is entitled to and hereby demands trial by a jury.

3 DATED: Wednesday, January 22, 2025.

ANGUS LEE LAW FIRM, PLLC

/s/ D. Angus Lee

D. Angus Lee, WSBA #36473
Attorneys for Plaintiffs
9105A NE HWY 99, Suite 200
Longview, WA 98665
P: 360.635.6464 F: 888.509.8268
Angus@AngusLeeLaw.com

MARK LINDQUIST LAW, PLLC

/s/ Mark Lindquist

Mark Lindquist, WSBA #25076
Attorney for Plaintiffs
100 South 9th Street
Tacoma, WA 98402
P: 206.333.0773
Mark@MarkLindquistLaw.com